

PATRICK J. SMITH
Environmental Engineer
(304) 234-2669



2001 APR 27

April 20, 2001

OHIO ENVIRONMENTAL PROTECTION AGENCY
Southeast District Office
2195 Front Street
Logan, Ohio 43138-9031

Attn: Mr. Richard Stewart
District Representative
Division of Hazardous Waste Management

**RE: RESPONSE TO MARCH 19, 2001 OEPA LETTER
WHEELING PITTSBURGH STEEL CORP.
MARTIN FERRY PLANT, MARTINS FERRY, OH**

Dear Mr. Stewart:

This letter is in response to your correspondence, dated March 19, 2001, related to hazardous waste management requirements at Wheeling-Pittsburgh Steel Corporation's (WPSC) Martins Ferry, Ohio Plant.

The following are our responses to your concerns, listed corresponding to the March 19 letter:

Prohibitions

WPSC disagrees that it is or was in violation of Ohio hazardous waste laws, and disagrees with the characterization of its activities as presented in your letter.

Closure Plan

Based on the observation made by USEPA, OEPA, and WPSC during the June, 1999 inspection, work (that would qualify as a generator closure of the ARCO ductwork and area), as provided in ORC 3745-66-11 (A) & (B) and 3745-66-14 was promptly performed. As you indicate, a report on these activities was provided to OEPA in correspondence dated November 30, 2000. In response to your request, WPSC had the sediments (and liquids) removed from the stormwater collection basin on April 5, 2001 by vacuum truck and containerized in a labeled, 55-gallon drum. Based on the analysis of representative sample of these sediments, we have determined them to be non-hazardous, and they will be disposed at a licensed non-hazardous solid waste landfill. The analysis is included as Attachment 1.



Mr. Richard Stewart
April 20, 2001
Page Two

Content of Contingency Plan ✓

The Martins Ferry Contingency Plan will be revised to address concerns raised in the OEPA letter. The revision is planned for completion by June 30, 2001.

Maintenance and Operation of facility ✓

Plant personnel have been reminded to prevent exposure of waste materials to the environment.

Testing and maintenance of equipment ✓

Please note the inventory of spill absorbents ("floor dry") is recorded on the weekly hazardous waste inspection logs. The fire protection equipment is recorded on a separate sheet. Logs from inspections for a minimum of one month are included as Attachment 2.

Accumulation time of hazardous waste

The trash container in these areas have been labeled "Trash Only - Ink Waste Prohibited" to clarify to our personnel the purpose of these containers. This item will also be emphasized in the annual hazardous waste training, which is attended by all personnel handling waste ink items. A photograph of the trash container is included as Attachment 3.

Management of Containers

The requested photographs are included as Attachment 4.

Used Oil Storage Requirements for Generators

Shortly following the June, 1999 inspection, the Used Oil tank was taken out of service. Subsequently, this tank and contaminated soil in this area have been removed. Photographs of the area following tank removal and cleanup are included as Attachment 5. Used Oil is currently accumulated in portable containers stored under cover.

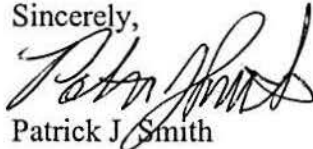
Mr. Richard Stewart
April 20, 2001
Page Three

General Comment

Upon review of our records, no indication was found of an upset condition at the WWTP on October 20, 1999 corresponding to the higher than normal lead concentration in effluent. However, the sludge generated at the WWTP is a result of operations conducted over several days. This effluent result is considered an outlier, and is not expected to have had any significant impact on lead content in the sludge.

If you have any questions regarding this submittal, please contact me at (304) 234-2669.

Sincerely,



Patrick J. Smith
Environmental Coordinator

Attachments

cc: Ken Komoroski (Kirkpatrick & Lockhart)
Todd Koget
BES/ECMF 1.4.5.2

\\MF\OEPA\0103-RS.DOC



Antech Ltd.

One Triangle Lane
Export, PA 15632
Phone: (724)733-1161
Fax: (724)327-7793

April 10, 2001

Mr. Patrick J. Smith
Wheeling Pittsburgh Steel Corporation
1134 Market Street
Wheeling, WV 26003

Dear Mr. Smith:

Enclosed are analytical results for samples submitted to Antech Ltd. by Wheeling Pittsburgh Steel Corporation. The samples were received on April 5, 2001. Please reference Antech project number 01-1690 when inquiring about this report.

Client Site: Martin's Ferry Plant
Client Ref.: [REDACTED] MF-TAK-01005

Antech Sample Identification	Client Sample Identification
[REDACTED]	[REDACTED]
0104-0341	MF-TAK-01005

General Comments: None

Please call me if you have any questions regarding the information contained within this report.

Sincerely,

A handwritten signature in cursive script that reads "Penelope J. Morris".

Penelope J. Morris
Project Coordinator

PJG: lmy

Enclosures

cc: Todd Koget, Wheeling Pittsburgh Steel Corporation

Mr. Patrick J. Smith
Wheeling Pittsburgh Steel Corporation
1134 Market Street
Wheeling, WV 26003

Lab Project ID: 01-1690
Lab Sample ID: 0104-0341
Client Sample ID: MF-TAK-01005
Sample Matrix: Solid

Client Site: Martin's Ferry Plant
Client Ref.: ~~MF-TAK-01005~~; MF-TAK-01005

Date Sampled: 04/05/2001
Date Received: 04/05/2001

General Chemistry

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Cyanide (Reactive)	9012A ⁽¹⁾	<1.0	1.0	mg/kg	TAT	04/06/2001	040609-12	<1.0
Flash Point	1010 ⁽¹⁾	>200	1.0	F	TAT	04/09/2001	N/A	N/A
pH	9045 ⁽¹⁾	5.09	1.00	pH	EAC	04/05/2001	040509-24	NAP
Sulfide (Reactive)	9030 ⁽¹⁾	<10	10	mg/kg	AME	04/05/2001	040509-27	<10

Metals

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Arsenic	TCLP/6010B ⁽¹⁾	<0.050	0.050	mg/l	WJM	04/06/2001	040907-03	<0.050
Barium	TCLP/6010B ⁽¹⁾	9.7	1.0	mg/l	WJM	04/06/2001	040907-03	<1.0
Cadmium	TCLP/6010B ⁽¹⁾	<0.050	0.050	mg/l	WJM	04/06/2001	040907-03	<0.050
Chromium	TCLP/6010B ⁽¹⁾	<0.050	0.050	mg/l	WJM	04/06/2001	040907-03	<0.050
Lead	TCLP/6010B ⁽¹⁾	0.82	0.050	mg/l	WJM	04/06/2001	040907-03	<0.050
Mercury	TCLP/7470 ⁽¹⁾	<0.010	0.010	mg/l	AJB	04/06/2001	040607-06	<0.010
Selenium	TCLP/6010B ⁽¹⁾	<0.10	0.10	mg/l	WJM	04/06/2001	040907-03	<0.10
Silver	TCLP/6010B ⁽¹⁾	<0.050	0.050	mg/l	WJM	04/06/2001	040907-03	<0.050

⁽¹⁾ U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: None



Laboratory Project No. _____

01-1690.

Project Name: _____ Project No.: _____ Sampler: Todd Kogut
(Printed Name) (Signature)

Relinquished By: (Signature and Printed Name) <u>Todd Kogel</u> <u>Todd Kogel</u>	Date <u>5APR61</u>	Time <u>1445</u>	Received By: (Signature and Printed Name) <u>Dane J. [Signature]</u>	Date <u>5APR61</u>	Time <u>1445</u>
Relinquished By: (Signature and Printed Name)	Date	Time	Received By: (Signature and Printed Name)	Date	Time

Relinquished By: (Signature and Printed Name) _____ Date _____ Time _____ Received By: (Signature and Printed Name) *[Signature]* Date *7-5-01* Time *1645*

Shipment ID: _____

[illegible]

Test parameters:

RCI, TCLP - metals

48hr turnaround

☐ Return to Client
☒ Disposal by Antech

Results To: Client Name: Todd Koze

Company: Wheeling Pitt Steel

Address: Mixio Junction

Phone No: _____

Fax No: (740) 283-5793

Invoice To: Client Name:

Company: Waeling-Pitt Steel

Address: Wheeler, WV

For Laboratory Use Only:

Sample Condition Upon Receipt:

Was Temperature Vial Sent With Cooler? YES NO ✓ Cooler Temperature: 74MP

WHITE - Original COC File YELLOW - Return with Report PINK - Project File GOLD - Client Receipt

TYPE OF WASTE	NUMBER OF CONTAINERS	LABELLED YES/NO	ACCUMULATION START DATE	CONDITION (LEAKING?)
Chromium Chem Treat & Floor Dry	1-20 Yd. Box	YES	7-20-00	GOOD - Box #222067 Tarp On Box
48" x 60" Alkali Tank S Sudge Waste	1-30 Yd. Box	—	—	GOOD - Box #303030 Tarp On Box
Hydrochloric Acid S Sudge Waste	1-30 Yd. Box			Box # No Box On Site
Floor Dry In. Stone 125 Bags				

HAZARDOUS WASTE STORAGE INVENTORY FORM

(PLANT #2) Attachment 2
Page 3

INSPECTED BY: L. Ba
DATE: 9-8-00 TIME: 1:00 PM

[illegible]

HAZARDOUS WASTE STORAGE
INVENTORY FORM

(PLANT #2)

Attachment 2

Page 4

INSPECTED BY: *L. Boe*
DATE: *9-15-00* TIME: *3:00 PM*

TYPE OF WASTE	NUMBER OF CONTAINERS	LABELLED YES/NO	ACCUMULATION START DATE	CONDITION (LEAKING?)
<i>Chromium Chem Treat & Floor Dry</i>	<i>1-20 Yd. Box</i>	<i>YES</i>	<i>7-20-00</i>	<i>GOOD Box # 222067 Tarp On Box</i>
<i>48" x 60" Alkali Tank Sludge Waste</i>	<i>1-30 Yd. Box</i>			<i>GOOD- Box # 303030 Tarp On Box</i>
<i>Hydrochloric Acid Sludge Waste</i>	<i>1-30 Yd. Box</i>			<i>Box # No Box On Site</i>
<i>Floor Dry In. Stone 115 Bags</i>				

P.05/07

TP-317402835793

00. 00 0000 11.10 PM 2000

HAZARDOUS WASTE STORAGE INVENTORY FORM

Attachment 2
(PLANT #2) Page 5

INSPECTED BY: L. Bore he
DATE: 9-22-00 TIME: 2:00P

[illegible]

HAZARDOUS WASTE STORAGE
INVENTORY FORMAttachment 2
(PLANT #2) Page. 6INSPECTED BY: *L. Boni*
DATE: *9-29-00* TIME:

TYPE OF WASTE	NUMBER OF CONTAINERS	LABELLED YES/NO	ACCUMULATION START DATE	CONDITION (LEAKING?)
<i>Chromium Chem Treat & Floor Dry</i>	<i>1-20 Yd. Box</i>	<i>YES</i>	<i>7-20-00</i>	<i>Box # 222065</i>
<i>48" & 60" Alkali Tank Sludge Waste</i>	<i>1-30 Yd. Box</i>			<i>Box # 303030</i>
<i>Hydrochloric Acid Sludge Waste</i>	<i>1-30 Yd. Box</i>			<i>Box # No Box On Site</i>
<i>Floor Dry In. Stone 110 Bags</i>				

ULI 00 2000 11:41 PM WPC ENGINEERING
** TOTAL PAGE: 07 **

ULI 00 2000 11:41 PM WPC ENGINEERING

ULI 00 2000 11:41 PM WPC ENGINEERING

P. 07/07

T 17402835793

ULI 00 2000 11:41 PM WPC ENGINEERING



Solid Waste Container
60-Inch
Galvanize Line

Attachment 4



**Satellite Waste Ink Container at 48-Inch Galvanize Line
(Properly Closed)**